



GDPR, Brexit and Cloud Software Group Services

At Cloud Software Group, we are aware that the United Kingdom's exit from the European Union ("Brexit") has raised questions among our customers about how their use of Cloud Software Group cloud, technical support and consulting services ("Services") may be impacted. This letter is designed to provide you with a better understanding of how Brexit does (and does not) impact your use of our Services.

Background

The United Kingdom (UK) left the European Union (EU) on 31 January 2020 and entered a Transition Period which ended on 31 December 2020. Following the Transition Period, a UK version of the EU GDPR applied to our UK-based processing activities involved in the delivery of our Services (UK GDPR). UK GDPR operates alongside the EU GDPR provisions which have extra-territorial effect and are designed to protect the personal data of individuals under its scope.

The UK GDPR is aligned with the EU GDPR in most respects, but is adapted to work in a "non-EU" context. It has extra-territorial effect designed to protect the personal data of individuals under its scope (in the same way that the EU GDPR currently does). The core data protection principles – namely, the controller and processor obligations and rights of individuals – remain substantially the same under the UK GDPR as under the EU GDPR. However, the mechanisms by which we transfer personal data to and from the UK have changed.

Cross Border Personal Data Transfers

The following applies to transfers of personal data to and from the UK:

UK to the EU: Transfers of personal data from the UK to the EU continue uninterrupted because the UK government has determined that transfers to European Economic Area States (EU member states and Iceland, Liechtenstein and Norway), Switzerland, and Gibraltar to be adequate. Adequacy decisions such as this confirm that a particular third country has an adequate data protection regime to protect personal data

EU to the UK: An [EU GDPR adequacy decision](#) concluded that the UK provides adequate protection for personal data transferred from the EU to the UK under the EU GDPR in circumstances other than immigration control.

UK to non-EU countries: Personal data transfers from the UK to countries covered by an EU adequacy decision¹ continue uninterrupted. Transfers from the UK to all other countries will require a transfer mechanism, and we incorporate the March 2022 UK International Data Transfer Addendum into our standard [Data Processing Addendum](#) for that purpose.

¹ Andorra, Argentina, Canada (commercial organizations only), Faroe Islands, Guernsey, Isle of Man, Israel, Japan (private-sector organizations only), Jersey, New Zealand, Republic of Korea, Switzerland, United Kingdom, and Uruguay.

Cloud Software Group Contract Terms

Cloud Software Group provides data processing terms in its [Data Processing Addendum](#) (DPA) that align to the applicable sections of the EU GDPR and UK GDPR, including the EU Standard Contractual Clauses. The DPA is incorporated by reference into Services contracts and does not require execution. We also provide a pre-executed version of the UK International Data Transfer Addendum that may be signed at your option.

If you would like to formally execute the Cloud Software Group UK International Data Transfer Addendum, **all Cloud Software Group customers (including TIBCO, ibi, Jaspersoft)** may do so by following a few simple steps:

1. Go to Citrix.com and Sign In to your Citrix account or create one.
2. Click “View EU Standard Contractual Clauses” on the left side.
3. Select UK International Data Transfer Addendum and click “New Agreement” and “Sign Document” to complete the Addendum electronically.

More Information

For more information about Cloud Software Group Privacy Compliance and Security practices, please see our Trust Center.

The Cloud Software Group Privacy Team

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